National Aeronautics and Space Administration Headquarters Washington, DC 20546-0001



September 14, 2006

Reply to Attn of:

General Law Practice Group

TO:

Distribution

FROM:

Alternate Designated Agency Ethics Official

SUBJECT:

Determination Regarding Attendance by NASA Attendees at the National

Space Club Luncheon, October 3, 2006

On October 3, 2006, the National Space Club will host a luncheon at L'Enfant Plaza Hotel, in Washington, DC. The National Space Club was founded in 1957 to stimulate the exchange of ideas and information about rocketry and astronautics and to promote the recognition of America's achievements in aerospace. The Club is a nonprofit corporation composed of representatives of industry, government, educational institutions and private individuals. Mr. Keith Masback, Director, Source Operations Group, National Geospatial Intelligence Agency is the guest speaker. Mr. Masback's topic will be a briefing to industry on National Geospatical Imagery. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The luncheon will be widely attended by Federal officials from some Government agencies, local government officials, Hill staffers, representatives of industry and private individuals. Approximately 100 people are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$75 per person. The luncheon will allow NASA employees the opportunity to discuss imagery related issues with other guests, and to discuss the accomplishments and progress of the Geospatial Intelligence Agency.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event so that NASA invitees may attend the event without charge. However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § $2\bar{\theta}$ 35.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

R. Andrew Falcon